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Attorneys for Defendant
GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MISAEAL AMBRIZ, JIMMY NIMMO,
CHRISTOPHER BISSONNETTE, AHMAD
MEHDIPOUR, EUGENE ERLIKH, JAMES
FOX, PETER SAMISH, and CHRISTOPHER
BARULICH, individually and on behalf of all
other persons similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Case No. 3:23-cv-05437-RFL

**STIPULATION EXTENDING TIME
FOR GOOGLE LLC TO RESPOND TO
PLAINTIFFS' CONSOLIDATED
AMENDED CLASS ACTION
COMPLAINT AND [PROPOSED]
ORDER**

Pursuant to Civil Local Rule 6-2, and as supported by the Declaration of Kristine Forderer filed herewith, Plaintiffs Misael Ambriz, Jimmy Nimmo, Christopher Bissonnette, Ahmad Mehdipour, Eugene Erlikh, James Fox, Peter Samish, and Christopher Barulich (“Plaintiffs”) and Defendant Google LLC (“Google”) (collectively, “Parties”), by and through their respective counsel, hereby stipulate and respectfully request that the Court extend Google’s deadline to answer Plaintiffs’ Consolidated Amended Class Action Complaint (“CAC”) by three weeks. The Parties declare in support of this request:

WHEREAS, on October 7, 2024, Plaintiffs filed the CAC;

WHEREAS, on November 12, 2024, Google moved to dismiss the CAC;

WHEREAS, on February 10, 2025, following the completion of briefing, the Court issued an order denying Google’s motion to dismiss the CAC;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), Google’s answer is due within 14 days of the Court’s order, *i.e.*, on February 24, 2025;

WHEREAS, the parties have met and conferred and have agreed, pursuant to the Court’s approval, to extend Google’s deadline to answer the CAC by three weeks, to March 17, 2025;

WHEREAS, the Court has scheduled a case management conference on March 5, 2025;

WHEREAS, the extension of Google’s deadline to answer the CAC shall not affect the case management conference or any related deadlines.

NOW, THEREFORE, pursuant to Local Rule 6-2, the Parties, by and through their respective counsel, stipulate as follows:

1. Google’s deadline to answer Plaintiffs’ CAC is extended by three weeks from February 24, 2025, to March 17, 2025.

IT IS SO STIPULATED AND AGREED.

1 Dated: February 18, 2025

COOLEY LLP

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3 By: /s/ Kristine Forderer
4 Kristine Forderer

5 Attorneys for Defendant
6 GOOGLE LLC

7 Dated: February 18, 2025

BURSOR & FISHER, P.A.

8
9 By: /s/ Neal J. Deckant
10 Neal J. Deckant

11 ATTORNEYS FOR PLAINTIFFS

12
13 **ATTESTATION**

14 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on
15 whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

16 Dated: February 18, 2025

17
18 By: /s/ Kristine Forderer
19 Kristine Forderer

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HON. RITA F. LIN
United States District Judge

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